

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**DECLARATION OF BRIAN D. GLUECKSTEIN IN FURTHER SUPPORT OF
DEBTORS' OBJECTION TO MOTION OF THE UNITED STATES TRUSTEE FOR
ENTRY OF ORDER DIRECTING THE APPOINTMENT OF AN EXAMINER**

I, Brian D. Glueckstein, hereby declare under penalty of perjury as follows:

1. I am a member in good standing of the Bar of the State of New York and have been admitted *pro hac vice* to practice before this Court. I am a partner of Sullivan & Cromwell LLP and am one of the attorneys representing FTX Trading Ltd. and the other Debtors in the above-captioned action. I submit this declaration in further support of *Debtors' Objection to the Motion of the United States Trustee for Entry of an Order Directing the Appointment of an Examiner* ("Objection").

2. Attached hereto as **Exhibit A** is a true and correct copy of the Omnibus Corporate Authority executed by Samuel Bankman-Fried, dated November 10, 2022.

3. Attached hereto as **Exhibit B** is a true and correct copy of the *First Interim Report of Neal Batson, Court-Appointed Examiner* filed on September 21, 2002 in the action captioned *In re Enron Corp.*, No. 01-16034 (Bankr. S.D.N.Y.).

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

4. Attached hereto as **Exhibit C** is a true and correct copy, excluding exhibits, of the *Second Interim Report of Neal Batson, Court-Appointed Examiner* filed on March 5, 2003 in the action captioned *In re Enron Corp.*, No. 01-16034 (Bankr. S.D.N.Y.).

5. Attached hereto as **Exhibit D** is a true and correct copy, excluding exhibits, of the *Third Interim Report of Neal Batson, Court-Appointed Examiner*, dated June 30, 2003, filed in the action captioned *In re Enron Corp.*, No. 01-16034 (Bankr. S.D.N.Y.).

6. Attached hereto as **Exhibit E** is a true and correct copy, excluding exhibits, of the *Final Report of Neal Batson, Court-Appointed Examiner* filed on November 4, 2003 in the action captioned *In re Enron Corp.*, No. 01-16034 (Bankr. S.D.N.Y.).

7. Attached hereto as **Exhibit F** is a true and correct copy, excluding exhibits, of the *Report of Arthur J. Gonzalez, as Examiner* filed on May 13, 2013 in the action captioned *In re Residential Capital, LLC*, No. 12-12020 (Bankr. S.D.N.Y.).

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on February 3, 2023

/s/ Brian D. Glueckstein
Brian D. Glueckstein